

GenX: DuPont first began manufacturing Teflon at its Washington Works, West Virginia facility in the early 1950s. The surfactant perfluorooctanoic acid (PFOA) was used in the manufacturing process. PFOA is an extremely stable compound and is known to accumulate and be retained in the human body for a very long time (half-life ranges from 2-8 years). Extensive human population toxicity studies have associated PFOA exposure to at least six health conditions. In 2006 under a stewardship program with EPA, DuPont and seven other companies agreed to phase out the use of PFOA in the manufacture of their products by 2015. About 2012, DuPont started using GenX as a replacement compound to PFOA in the manufacture of Teflon. While the two compounds are similar in many ways, GenX, unlike PFOA, clears from the body very rapidly. A 2009 EPA consent Order with DuPont required the company to recover or destroy at least 99% of GenX in its emissions at Washington Works. A consent Order between WVDEP and DuPont (now Chemours) issued in 2011, allows Chemours to discharge GenX in its wastewater at up to 17,500 ppt and the compound has been identified in concentrations as high as 130 ppt in nearby streams. DuPont has conducted a number of toxicity studies on GenX and finds it to be considerably less toxic than its predecessor PFOA. However, this finding has been challenged by other scientists who believe that more research needs to be conducted. There is also considerable concern about other GenX analytes which have been identified in the Cape Fear River, downstream from the Fayetteville, NC facility where Chemours manufactures GenX. Some of the analytes have been measured at levels much greater than GenX. EPA has not yet established a drinking water regulation or health advisory for GenX or any of its analytes.

Ex. 5 Deliberative Process (DP)